

Date of Service: October 15, 2021

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

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Attorneys for Plaintiff

Illinois Union Insurance Company

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ILLINOIS UNION INSURANCE COMPANY,

Plaintiff,

v.

BARUCH SINGER; BOND DOWNTOWN
PHOENIX LLC; COWORKRS LLC DBA BOND
COLLECTIVE; COWORKRS 23RD STREET
LLC; COWORKRS 55 BROADWAY LLC;
COWORKRS 60 BROAD STREET LLC;
COWORKRS 3RD STREET LLC; J. DOE(S) 1-
10 (FICTICIOUS NAMES REPRESENTING
UNKNOWN INDIVIDUALS); and XYZ
CORP(S) 1-10 (FICTICIOUS NAMES
REPRESENTING UNKNOWN
CORPORATIONS),

Defendants.

Civ. Action No.: 21-cv-01170 (JPC)

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION FOR SUMMARY
JUDGMENT**

TO: Richard L. Yellen & Associates, LLP
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SIR/MADAM:

PLEASE TAKE NOTICE that on a date and time to be set by the Court, the undersigned, as counsel for Plaintiff Illinois Union Insurance Company will move before the United States District Court, Southern District of New York, Daniel Patrick Moynihan United States Courthouse located at 500 Pearl Street, New York, New York 10007, for an order of Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that, in support of its motion, Illinois Union Insurance Company shall rely upon the pleadings filed in this matter, as well as the annexed and incorporated Memorandum of Law, Affidavit of Natalie M. Mercandetti, Esq. (sworn to this 15th day of October, 2021) with exhibits, and Statement of Material Facts pursuant to Local Rule 56.1.

PLEASE TAKE FURTHER NOTICE THAT oral argument is requested if opposition to this motion is filed.

Dated: October 15, 2021

McELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP
Attorneys for Plaintiff
Illinois Union Insurance Company

By: /s/ Michael R. Morano, Esq.
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Defendants shall file their opposition by November 2, 2021. Plaintiff shall file its reply by November 9, 2021.

SO ORDERED. Date:
October 19, 2021

New York, New York


JOHN P. CRONAN
United States District Judge